

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ADAM FERRARI,

Plaintiff,

v.

WILLIAM FRANCIS,

Defendant.

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CIVIL ACTION NO. 3:23-CV-455

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26 and the Court’s inherent authority to manage the discovery process, Plaintiff, Adam Ferrari (“Ferrari” or “Plaintiff”), and Defendant, William Francis’s (“Francis” or “Defendant”), (collectively referred to herein as the “Parties”) respectfully request that the Court enter a [Proposed] Agreed Protective Order (“Protective Order”) in this case. The Parties consider certain information and documents in their possession to be confidential and proprietary, including, inter alia, personal, confidential, trade secret, proprietary, technical, business and/or financial information, and therefore, mutually desire that a Protective Order limiting the use, access to and disclosure of such information and documents be entered. The terms of the Protective Order have been negotiated by the Parties, and the Parties have agreed on the proposed language.

A copy of the proposed Protective Order that the Parties request the Court to enter is attached hereto as Exhibit 1.

Respectfully submitted,

/s/Ross M. Good
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary, because this document is being filed with the Court's electronic-filing system.

/s/ Ross M. Good

Ross M. Good